

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MARIA RUSCELLI,

Plaintiff,

-against-

THE DEPARTMENT OF EDUCATION OF THE CITY  
OF NEW YORK,

Defendant.

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**DECLARATION OF  
ASSISTANT CORPORATION  
COUNSEL MADELEINE A.  
KNUTSON IN SUPPORT OF  
DEFENDANT’S REPLY TO  
MOTION TO DISMISS THE  
COMPLAINT**

No. 23-CV-07475 (AMD)(LB)

**Madeleine A. Knutson**, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendant the Department of Education of the City of New York in the above referenced action.

2. Annexed hereto as Exhibit 1 is a true and correct copy of Plaintiff’s Memorandum of Law in Opposition to Defendant’s Motion to Dismiss in Masciarelli v. New York Dep’t. of Educ., 22-CV-7553, filed August 14, 2023. This document was referenced in Plaintiff’s Opposition to Defendants’ Motion to Dismiss and in Defendant’s Reply Memorandum of Law in Support of Defendant’s Motion to Dismiss

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 21, 2024

**HON. SYLVIA O. HINDS-RADIX**

Corporation Counsel of the City of New York

*Attorney for Defendant*

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By:           /s/ Madeleine A. Knutson            
          Madeleine A. Knutson, Esq.  
          Assistant Corporation Counsel